

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

GOLDEN BETHUNE-HILL, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF ELECTIONS,
et al.,

Defendants.

Civil Action No. 3:14-cv-00852-REP-
AWA-BMK

PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND LITIGATION EXPENSES

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 54, Plaintiffs move for an award of attorneys' fees and reasonable litigation expenses. 42 U.S.C. § 1988 and 52 U.S.C. § 10310(e) allow the prevailing party in a voting-rights action under § 1983 to recover attorneys' fees and reasonable litigation expenses, including expert fees. Plaintiffs sought declaratory and injunctive relief under § 1983 for the Defendants' violation of the U.S. Constitution. The Court awarded Plaintiffs this relief in its Memorandum Opinion and Order of June 26, 2018 (Dkt. Entry No. 234, 235). The Court's Order constitutes a judgment, defined as "any order from which an appeal lies," Fed. R. Civ. P. 54(a), because the order is appealable under 28 U.S.C. § 1253 (providing that, "[e]xcept as otherwise provided by law, any party may appeal to the Supreme Court from an order granting or denying, after notice and hearing, an interlocutory or permanent injunction in any civil action, suit or proceeding required by any Act of Congress to be heard and determined by a district court of three judges"). Consequently, Plaintiffs respectfully request an award of their attorneys' fees and reasonable litigation expenses.

DATED: July 10, 2018

By: /s/ Aria C. Branch

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CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of July, 2018, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the counsel of record in this case.

By /s/ Aria C. Branch
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